

Scott & Missy Riffle
Arbonne Independent Consultants

June 30, 2006

Federal Trade Commission/Office of the Secretary, Room H-135 (Annex W)
Re: Business Opportunity Rule, R511993
600 Pennsylvania Avenue, NW
Washington, DC 20580
RE: Business Opportunity Rule, R511993

Dear Sir or Madam:

Missy and I are writing this letter because we are concerned about the proposed Business Opportunity Rule R511993. We believe that in its present form, it could prevent us from continuing as Arbonne Independent Consultants. I understand that part of the FTC's responsibility is to protect the public from "unfair and deceptive acts or practices," but some areas of the proposed rule will make it very difficult, if not impossible, for us to sell Arbonne products and sponsor people into the business.

We have been Arbonne Independent Consultants for more than 11 years. We became Consultants because we love the products and Missy and I wanted to be able to work together as a team from home. Since starting our Arbonne business, we have developed a team of over 1,080 Independent Consultants across the country and together we are helping other families enjoy better lives. We built our business on fair and honest practices. The majority of our network of Independent Consultants joined us along with Arbonne to be able to purchase Arbonne's products at the same discount we get. We have never encouraged someone to join our company for more than the \$29.00 application fee it costs to get started. In fact over 11 years ago I encouraged my wife, who at the time was buying her Arbonne products at retail prices, to sign up so she could get them at a discounted price, what a deal! That is how we have built a successful business with Arbonne.

One of the most confusing and restrictive sections of the proposed rule is the 7-day waiting period to sign up new Consultants. Not only do Arbonne Starter Kits cost a nominal amount of money, the proposed waiting period gives the impression that there might be something wrong the Arbonne opportunity. Under this waiting period requirement, we will need to keep very detailed records when we first speak to someone about Arbonne and keep track of when to follow up. One of the key elements to our success in this business has been capturing the enthusiasm and immediate results prospects experience with Arbonne products; the waiting period would potentially limit our ability to grow our business. We realize that there are deceptive individuals out there in the market place that give network marketing a bad name because of their practices, however, it seems that **no** industry is immune from these types of people, just take a look at what happened with Enron. Instead of making it harder to join a

company, why not require longer periods of time for a person to cancel their agreement and return products if they are unhappy with their decision instead of requiring the 7 day waiting period before they can sign up? If an individual is conducting his or her business with honesty & integrity then this won't be a problem. In Arbonne we have no minimum purchase requirements and we don't encourage **any** inventory of products. In addition we also have a 45 day money back guarantee.

The proposed rule also calls for the release of **any** information regarding lawsuits involving misrepresentation, or unfair or deceptive practices. It does not matter if the company was found innocent. A lawsuit may incorrectly imply wrongdoing and it seems unfair to disclose lawsuit information unless Arbonne has been found guilty of something. We fear being penalized by the impression a lawsuit would leave, even if we have done nothing wrong.

Finally, the proposed rule requires the disclosure of a minimum of 10 prior Independent Consultants nearest to the prospective Consultant. We are glad to provide references, but identity theft is a reality we live with in today's world and we are very uncomfortable with giving out personal information about individuals, without their permission or knowledge, to strangers. Also, sharing this information could damage the business relationship of references with those involved in other companies or businesses, or provide an unfair advantage to competitors. In order to get the proposed list of 10 prior Independent Consultants, we would need to send the address of a prospect to the Arbonne corporate office in California and then wait for the list. The proposed rule also includes the language, "If you buy a business opportunity from the seller, your contact information can be disclosed in the future to other buyers" and prospects will be understandably concerned about their privacy. We would find it an invasion of privacy to disclose personal data, for our business purposes.

We truly appreciate the work of the FTC in protecting consumers, but we believe this proposed new rule would have many detrimental (and unintentional) consequences and we hope there are alternative means to resolving the outstanding issues at hand, without harming the livelihood of millions of successful network marketers, like us.

Thank you for your time and understanding.

Sincerely,

Scott & Missy Riffle
Arbonne Independent Consultants